SUMMARY OF THE
FIELD ACTIVITIES COMMITTEE MEETING
NOVEMBER 1, 2000

The Field Activities Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Wednesday, November 1, 2000, at 9:00 a.m. and at 1:30 p.m. Pacific Standard Time (PST) as part of the Sixth NELAC Interim Meeting (NELAC 6i) held in Las Vegas, NV. The meeting was led by the committee chair, Mr. Daniel Bivins of the U.S. Environmental Protection Agency (EPA). A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to discuss today's agenda items and receive comment from committee and audience participants.*

INTRODUCTION - MORNING SESSION

After the committee meeting ground rules were reviewed, Mr. Bivins and each committee member made introductions and gave a background statement. Mr. Bivins noted that two new committee members had recently been approved to replace two who had resigned. Both new members, Mr. Matt DeVito and Mr. Jim Davies, have extensive experience in stack sampling and accreditation programs, respectively. Mr. Bivins then reviewed the agenda for the day.

AGENDA ITEMS

General Sampling Standard Status

Committee member Dr. Bart Simmons gave a history of the development of the draft sampling standard and called attention to the draft version of Chapter 7, Field Activities, in the proposed changes booklet. There were two major issues: standards for sampling and standards for in-field measurements. Dr. Simmons noted that sampling is potentially the greatest source of error in the process of producing data. The committee previously decided to model the general sampling standard on the language of International Organization for Standardization (ISO) Standard 17025. Dr. Simmons reviewed the proposed standard and asked for committee and audience input, noting that the scope covers all sampling for environmental compliance purposes. Many field samples are collected by companies, other than the analytical laboratory. Training requirements are included but not specific educational requirements. A comment was made on the use of the term "laboratory," e.g., application of the standard to a wastewater laboratory not collecting the sample? A discussion ensued which included a wide range of issues. The committee agreed to compare chapter 7 with the other NELAC chapters to avoid duplication of requirements. The committee also noted that the general sampling standard currently applies only to laboratories. Mr. Bivins suggested that he and Dr. Simmons ask for time on the agenda of the Accreditation Authority Committee to discuss this limitation. The next topic, Section 7.1.8 b), was discussed with respect to the term "matrix." Matrix refers to only a few distinct categories, for example, air or soil, and is not intended to refer to individual analytes.

Advisability of Media Specific Sampling Standards

Dr. Simmons presented results of a survey done several years ago by his department to assess interest in NELAC development of uniform national sampling standards. Air emissions testing and water sampling were priority interests. The Field Activities Committee is encouraged to proceed with due speed to address field measurements and to establish accreditation methods and standards. Sampling for petroleum spills and groundwater contamination are among the top activities. A committee member suggested that one option may be to prepare appendices to the standard which deals with specifics, as other committees have done, which generated further discussion.

After the morning break, Dr. Simmons referred to a question asked earlier about the case of a laboratory within a large organization and how accreditation might apply to different divisions within such a large company. Options include:

- building sufficient flexibility into the standard so that the accrediting authority would be allowed to make a decision.
- providing further guidance in the standard.
- developing a system that requires the sampling organization to provide the laboratory with evidence that the sample(s) was collected and handled according to established protocols.

Comments were received on the need for oversight and training.

Measurement of Source Emission Standard

Mr. Bivins gave background on the measurement of source emissions (MSE) standard. He noted that the Source Evaluation Society had studied accreditation for source emissions activities in the 1970s and 1980s. The Source Evaluation Society requested that EPA develop a program to accredit stack testing companies in 1989. EPA began to develop an accreditation program and, when NELAC came into existence, the program began to be integrated into NELAC. He mentioned recent developments such as the formation of the Air Source Emissions Task Team (ASETT) subcommittee under the Environmental Laboratory Advisory Board (ELAB), stakeholder involvement, and the new role of the MSE subcommittee.

Discussion of earlier agenda items was entertained by the committee. In addition to previous comments the issue of inclusion of notes in the standard was raised. The NELAC Board of Directors recently issued a ruling that any non-mandatory statements or notes should not appear in the NELAC Standard. Several suggestions were made on the best way to incorporate the notes. Dr. Simmons will redraft Chapter 7.

Two other concerns were raised. It is possible that NELAC may no longer be able to include ISO

17025 language (even derivatory language) in the NELAC Standard. It would then be necessary to determine the process for referencing ISO 17025. A question of non-committee members attending committee teleconferences was referred to the NELAC Board of Directors.

ADJOURNMENT OF MORNING SESSION

Mr. Bivins closed the morning session by reminding everyone that review comments on the proposed Field Activities Chapter of the NELAC Standard need to reach him by January 19, 2001, in order to meet the schedule for preparation of materials for voting at NELAC 7.

AFTERNOON SESSION

ASETT Draft Standard Report

To begin the afternoon session, the committee called on Mr. Scott Evans, chair of ASETT which is an ELAB subcommittee, to report on progress on the ASETT draft standard. Mr. Evans and Mr. David Elam first described the typical stack testing firm. Mr. Elam said that lists of available stack sampling firms are maintained by about 35 states. Nearly 65 percent of the stack testing firms have less than 10 employees. On average, stack testing firms generate about 1.5 million dollars in revenue annually. Many firms rent their sampling equipment to avoid large investments. ASETT's major questions are: (1) are such firms who travel to a site considered mobile laboratories?, and (2) how many individual accreditations might be required?

Philosophy of Accreditation

Stack samplers are not talking about a narrow definition of a performance-based measurement system (PBMS) standard. In 1995, the Office of Management and Budget (OMB) stated that one should a) establish measurable objectives, b) not prescribe the means to achieve these objectives, and c) PBMS is an example.

Structure of the Standard

Mr. Evans presented slides to discuss the ASETT Draft Standard. He proposed that conformance is not established through paperwork, but rather through adherence to the test methods as judged by withstanding the scrutiny of an audit. Dr. Simmons requested a statement of the objectives and where they are found. Mr Evans stated it is not possible to judge the competence of a firm without observing its crew's performance in the field. Mr. Evans noted that there are many sources of performance feedback: auditor, assessor, observer, and others. If procedural and data problems are found, corrective actions are taken and quality continues to improve. Informal processes are especially important for a small company since they avoid large amounts of paperwork. The focus should be on the actual performance, not on paperwork.

The Role of the Assessor

Mr. Evans likened the assessor's role to that of a referee. The assessor verifies that all components of the quality system are present and that it is working. In Mr. Evans' view the assessor does not judge the effectiveness of the quality system in the absence of performance data, nor does he assess technical competence. Mr. Evans noted that an observer is present at 35-50% of source sampling tests. He also made note of the role of an observer vs. an assessor, and outlined the plans of the state of Louisiana. Mr. Evans described how a stack testing company operates and the use of a test protocol. One commenter found the definition of PBMS to be a variance with that described in the ELAB presentation.

Mr. Evan then addressed the need for a stand-alone document for stack testers. It was noted that Louisiana accredits all testing, including air testing, under the NELAC standards. A committee member requested that ELAB be informed of the direction ASETT is considering. Mr. Evans replied that he thought the ASETT standard could still be implemented under NELAC. The next steps are to gather feedback from this group and from ELAB later this week, and meet to resolve the negative votes. It was noted that the ASETT document has been submitted to ELAB as a non-consensus draft product. If not accepted into NELAC (via the Field Activities Committee), Mr. Evans plans to further it through ASTM channels. Mr. Evans was asked to follow the same timetable as the Field Activities Committee, i.e., receive comments up until January 19, 2001 and submit a completed document by March 19, 2001.

JOINT SESSION OF FIELD ACTIVITIES AND ACCREDITATION PROCESS COMMITTEES

Ms. Janet Cruse, Chair of the Accreditation Process Committee, spoke about their morning session. Across-the-board accreditation of mobile laboratories as separate entities has not been accepted in the past. Instead, the primary accrediting authority has been charged to make the decision on which mobile laboratories should be accredited. Such language was accepted last July and most participants were fairly satisfied. Mr. Bivins said his committee thought definitions were needed and presented definitions for field measurements, fixed-based laboratory, and mobile laboratory.

Mr. Bivins read the committee's suggested changes to subsections b, c, and d of Section 4 of the Accreditation Process chapter. Mr. Peter Law further clarified the intent and purpose of the changes. Mr. Gleason Wheatley suggested changing the reference from State to Primary Accreditation Authority. The two committee discussed the need for following proficiency testing (PT) requirements. Further discussion ensued on the subject of on-site assessments for mobile laboratories and the inherent logistical difficulties and costs. A representative from the U.S. EPA's Office of Solid Waste (OSW) asked the committees to seriously consider the definition of a mobile laboratory as a priority. A commenter remarked that the Field Activities Committee's suggestions for the standards are more stringent than those in Chapter 4. A participant suggested that a technical director should be on site with each mobile laboratory to ensure the quality system is in fact being followed. Field measurements must be clearly defined. It was also noted that currently states do not accredit mobile laboratories in an identical

manner.

A plan of action to resolve the two committee's diverging views needs to be set. Ms. Cruse and Mr. Bivins will see that the two committees meet and make progress via teleconferences.

The meeting was adjourned at 5:00 p.m.

Attachment A

Action Items
Field Activities Committee Meeting
November 1, 2000

Item No.	Action	Date to be Completed
1.	Revise Field Activities Standard. Cross-reference other chapters of the NELAC Standard (Simmons)	
2.	Request time on the Accreditation Authority agenda to discuss scope of accreditation for sampling standards (Bivins, Simmons)	2/01
3.	Add language to Section 7 from Section 5.11, 5.13 (Simmons)	2/01
4.	Send all comments on Field Activities Standard to D. Bivins by January 19, 2001 (all)	1/19/01
5.	Ask about the NELAC policy on closed meetings (Bivins)	12/00
6.	ASETT to provide materials to D. Bivins by January 19, 2001 (S. Evans and ASETT Committee)	1/19/01
7.	Set plan of action to reconcile differences of Field Activities and Accreditation Process Committees on mobile laboratory language. Set up joint teleconferences (Bivins, Cruse)	1/19/01

Attachment B

PARTICIPANTS
FIELD ACTIVITIES COMMITTEE MEETING
NOVEMBER 1, 2000

Name	Affiliation	Address
Bivins, Daniel Chair	U.S. EPA/OAR	T: (919) 541-5244 F: (919) 541-1039 E: bivins.dan@epa.gov
Darley, Robert	US Navy - NAVSEA Programs FO	T: (843) 764-7337 F: (843) 764-7360 E: darleyre@navsea.navy.mil
Davies, Jim (absent)	LA DEQ/Environmental Technology Division	T: (225) 765-0276 F: (225) 765-0617 E: james_c@deq.state.la.us
Dege, John	DuPont/Chemical Manufacturers Association	T: (302) 773-0900 F: (302) 774-1361 E: john.a.dege@usa.dupont.com
DeVito, Matt	CONSOL Energy	T: (412) 854-6679 F: (412) 854-6613 E: mattdevito@consolenergy.com
Dunn, Rick	Hach Company	T: (970) 669-3050 F: (703) 669-2932 E: rdunn@hach.com
Keith, Larry (absent)	Waste Policy Institute (WPI)	T: (678) 344-0001 F: (678) 344-2345 E: larry_keith@wpi.org
Law, Peter	Severn Trent Laboratories	T: (413) 572-4000 ext. 101 F: (413) 572-3707 E: plaw@stl-inc.com
Simmons, Barton	CA EPA, DTSC, Haz. Mat. Lab.	T: (510) 540-3112 F: (510) 540-2305 E: bsimmons@dtsc.ca.gov
Tintle, Andrew	FL Dept. of Environmental Protection	T: (850) 921-9733 F: (850) 922-4614 E: andrew.tintle@dep.state.fl.us
Eaton, Cary (Contractor Support)	Research Triangle Institute	T: (919) 541-6720 F: (919) 541-7215 E: wce@rti.org